

EXHIBIT 61

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, et al.,

PLAINTIFFS,

-against-

Case No:
04CV397 (GBD) (RLE)

THE PALESTINE LIBERATION
ORGANIZATION, et al.,

DEFENDANTS.

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DATE: October 15, 2012

TIME: 7:23 P.M.

DEPOSITION of ELIEZER SIMCHA

GOLDBERG, taken by the Defendants, pursuant
to Notice and to the Federal Rules of Civil
Procedure, held at the offices of Morrison
& Foerster, 1290 Avenue of the Americas,
New York, New York 10104, before Robert X.
Shaw, CSR, a Notary Public of the State of
New York.

1 Eliezer S. Goldberg

2 Hebrew)

3 THE WITNESS: (Speaking in

4 Hebrew)

5 THE INTERPRETER: Apparently.

6 Q. Could it be Yael Salekowsky?

7 THE INTERPRETER: (Speaking in

8 Hebrew)

9 THE WITNESS: (Speaking in

10 Hebrew)

11 THE INTERPRETER: I think so.

12 Q. Okay. Eliezer, you weren't

13 with your father the day that he was

14 killed, were you?

15 THE INTERPRETER: (Speaking in

16 Hebrew)

17 THE WITNESS: (Speaking in

18 Hebrew)

19 THE INTERPRETER: That is

20 correct.

21 Q. So you did not see him after he

22 died?

23 THE INTERPRETER: (Speaking in

24 Hebrew)

25 THE WITNESS: (Speaking in

1 Eliezer S. Goldberg

2 Hebrew)

3 THE INTERPRETER: That is
4 correct.

5 Q. Eliezer, you are claiming
6 future medical expenses?

7 THE INTERPRETER: (Speaking in
8 Hebrew)

9 THE WITNESS: (Speaking in
10 Hebrew)

11 THE INTERPRETER: I don't know.

12 Q. It means that you expect that
13 you are going to have the need for medical
14 care in the future?

15 THE INTERPRETER: (Speaking in
16 Hebrew)

17 THE WITNESS: (Speaking in
18 Hebrew)

19 Q. Do you think that you will have
20 need for medical care?

21 THE INTERPRETER: (Speaking in
22 Hebrew)

23 THE WITNESS: (Speaking in
24 Hebrew)

25 THE INTERPRETER: What medical?

1 Eliezer S. Goldberg

2 Killing. That's it.

3 Q. Okay. Eliezer, do you know why
4 you have sued the PA and the PLO?

5 THE INTERPRETER: I am sorry.
6 I need the "you" before "sued," I
7 need to know whether it is singular
8 or plural in order to translate the
9 question.

10 MS. MATTA: You as an
11 individual.

12 THE INTERPRETER: (Speaking in
13 Hebrew)

14 THE WITNESS: (Speaking in
15 Hebrew)

16 THE INTERPRETER: That is the
17 work of my attorneys.

18 Q. Okay. Do you have any
19 knowledge about the claims that you are
20 making?

21 THE INTERPRETER: About the
22 claims?

23 MS. MATTA: That you are
24 making.

25 THE INTERPRETER: (Speaking in

1 Eliezer S. Goldberg

2 Hebrew)

3 THE WITNESS: (Speaking in

4 Hebrew)

5 THE INTERPRETER: No.

6 Q. Are you aware of any evidence
7 that the PA or the PLO had anything to do
8 with the bombing in which your father was
9 killed?

10 THE INTERPRETER: (Speaking in
11 Hebrew)

12 THE WITNESS: (Speaking in
13 Hebrew)

14 THE INTERPRETER: That is for
15 my lawyer. I don't know.

16 Q. Okay. Is it fair to say that
17 you don't have any personal knowledge?

18 THE INTERPRETER: (Speaking in
19 Hebrew)

20 THE WITNESS: (Speaking in
21 Hebrew)

22 THE INTERPRETER: What does
23 that mean?

24 Q. Is it fair to say that you
25 don't have personal knowledge about the

1 Eliezer S. Goldberg
2 allegations that underlie your lawsuit?

3 THE INTERPRETER: (Speaking in
4 Hebrew)

5 THE WITNESS: (Speaking in
6 Hebrew)

7 THE INTERPRETER: That is
8 correct.

9 THE WITNESS: (Speaking in
10 English) Could I take a break?

11 MR. SOLOMON: Yes. Off the
12 record.

13 (Whereupon, an off-the-record
14 discussion was held.)

15 MS. MATTA: Back on the record.

16 Q. Eliezer, can you remember the
17 names of the schools that you have been to?

18 THE INTERPRETER: (Speaking in
19 Hebrew)

20 THE WITNESS: (Speaking in
21 Hebrew)

22 THE INTERPRETER: Yes. Nite
23 Meir, Yechi Reuven, Imrei Shefer and
24 Holyland.

25 Q. What was the one that you